

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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	:
In re	: Chapter 11 Case No.
	:
LEHMAN BROTHERS HOLDINGS INC., <i>et al.</i> ,	: 08-13555 (JMP)
	:
Debtors.	: (Jointly Administered)
	:
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SUPPLEMENTAL AFFIDAVIT OF JANE SULLIVAN

STATE OF NEW YORK)
) ss:
COUNTY OF NEW YORK)

Jane Sullivan, being duly sworn, deposes and says:

1. I am an Executive Vice President of Epiq Bankruptcy Solutions, LLC (“Epiq”), which provides chapter 11 claims management, noticing, case administration, solicitation, tabulation and related services. I am authorized to submit this supplemental affidavit on behalf of Epiq.

2. I submit this supplemental affidavit pursuant to the: (a) Order Approving Application Pursuant to 28 U.S.C. §156(c) and Local Rule 5075-1(a) for Authorization to (i) Employ and Retain Epiq Bankruptcy Solutions, LLC Claims and Noticing Agent for the Debtor, and (ii) Appoint Epiq Bankruptcy Solutions, LLC as Agent for the Bankruptcy Court, dated September 16, 2008 (the “Original Retention Order”); and (b) Order Pursuant to Section 327(a) of the Bankruptcy Code and Rule 2014 of the Federal Rules of Bankruptcy Procedure Authorizing the Expansion of the Retention of Epiq as Solicitation and Voting Agent to the Debtors, Effective September 1, 2011, dated August 31, 2011 (the “Supplemental Retention Order”).

3. The Trustees administering the separate bankruptcy proceedings of Lehman Brothers Treasury Co. B.V. ("LBT") in The Netherlands and Lehman Brothers Securities N.V. ("LBS") in Curacao intend to retain Epiq to provide advice and assistance on matters pertaining to voting, tabulation, claims trading and management, disbursement and other administrative issues. LBT and LBS asserted claims in the Lehman Brothers Holdings Inc. ("LBHI") chapter 11 cases, and LBHI asserted claims in both of the LBT and LBS cases. The services to be provided by Epiq to LBT and LBS will focus solely on the bankruptcy proceedings of those entities. Epiq will not assist LBT or LBS in connection with their LBHI claims, nor with respect to other matters pertaining to LBHI. Epiq has received consent from LBHI to be retained by LBT and LBS.

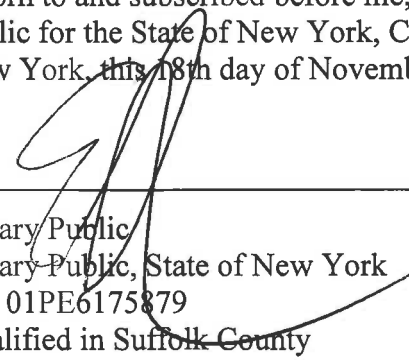
4. Epiq does not believe the foregoing constitutes an actual or potential conflict that would affect its disinterestedness in these cases.



Name: Jane Sullivan

Title: Executive Vice President

Sworn to and subscribed before me, a notary public for the State of New York, County of New York, this 18th day of November, 2011.



Notary Public
Notary Public, State of New York
No. 01PE6175879
Qualified in Suffolk County
Commission Expires 10-22-2015